

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN,

Plaintiff,

v.

OMNIS GLOBAL TECHNOLOGIES, LLC;
OMNIS BUILDING TECHNOLOGIES, LLC;
OBT BLUEFIELD, LLC; OMNIS FUEL
TECHNOLOGIES LLC D/B/A OMNIGEN;
AND OMNIS SUBLIMATION RECOVERY
TECHNOLOGIES, LLC,

Defendants.

Civil Action No. 2:24-cv-01319

**STIPULATION AND ORDER TO WITHDRAW COUNTERCLAIM, FILE AMENDED
COMPLAINT, AND ANSWER OR OTHERWISE MOVE**

Plaintiff Michelle Christian (“Plaintiff”) and Defendants Omnis Global Technologies, LLC; Omnis Building Technologies, LLC; OBT Bluefield, LLC; Omnis Fuel Technologies, LLC D/B/A Omnigen; and Omnis Sublimation Recovery Technologies, LLC (collectively, “Defendants”) hereby state the following:

1. Plaintiff filed a Complaint on March 28, 2024 (ECF No. 1);
2. Defendants filed a Motion to Dismiss on May 28, 2024 (ECF No. 10);
3. Defendants filed a Counterclaim on October 15, 2024 (ECF No. 20);
4. Pursuant to the policies and procedures of the Honorable Mia Roberts Perez, the parties met and conferred about Plaintiff’s anticipated motion to dismiss Defendants’ Counterclaim;
5. The parties hereby stipulate and agree:
 - a. Defendants will withdraw their Counterclaim without prejudice;

b. Plaintiff will file an Amended Complaint to assert claims under the Pennsylvania Human Relations Act, and Defendants waive any arguments that such claims are not ripe;

c. Defendants will answer or otherwise move to Plaintiff's Amended Complaint and will file a Counterclaim; and

d. Plaintiff will respond to any newly filed Counterclaim pursuant to the Federal Rules.

SO STIPULATED AND AGREED:

/s/ Christine E. Burke

Christine E. Burke, Esq.
Karpf, Karpf, & Cerutti, P.C.
3331 Street Road,
Two Greenwood Square, Suite 128
Bensalem, PA 19020
cburke@karpf-law.com

Attorney for Plaintiff

Dated: October 29, 2024

/s/ Matthew J. Hank

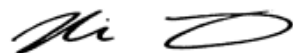
Matthew J. Hank, Bar No. 86086
mhank@littler.com
Alexa J. Laborda Nelson, Bar No. 314652
alabordanelson@littler.com
Haley R. Norwillo, Bar No. 333731
hnorwillo@littler.com

LITTLER MENDELSON, P.C.
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102.1321
Telephone: 267.402.3000
Facsimile: 267.402.3131

Attorneys for Defendants

Date: October 29, 2024

SO ORDERED:



Hon. Mia Roberts Perez